

## REMARKS

Applicants request favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1, 3, 5-17, 19, and 21-23 are pending in this application, with Claims 1, 17, 19, and 22 being independent. Claims 2, 4, 18 and 20 have been cancelled without prejudice.

Claims 1, 5, 6, 17, 19, 21, and 22 have been amended been added. Applicant submits that support for the amendments can be found in the original disclosure, and therefore no new matter has been added.

Claims 1-11 and 16-23 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,785,814 (Usami et al.) in view of U.S. Patent No. 4,864,108 (Hamada et al.). Claims 12-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Usami et al. and Hamada et al. in view of U.S. Publication No. 2001/0013097 A1 (Ito et al.). Applicants respectfully traverse these rejections for the reasons discussed below.

As recited in independent Claim 1, the present invention includes, *inter alia*, the feature of encrypting information-added data to make it difficult to detect a position where additional information is added to image data, wherein the information-added data is encrypted by randomly arranging the data. With this feature of encrypting the information-added data (i.e., the image data to which additional information has been added) by randomly arranging the data, the position where the additional information is added to the image data is difficult to detect and it is more difficult for someone to attack the additional information.

Applicant submits that the cited art fails to disclose or suggest at least the above-mentioned feature. Usami et al. discloses that division means 22 divides an image represented by original image data S0 into areas of a plurality of blocks to obtain image data Sn for each area. Supplementary information generating means 23 generates information regarding photographing as supplementary information H, and optimization means 24 optimizes the supplementary information H for each area divided by the division means 22 to obtain supplementary information Hn for each area. Embedding means 25 then embeds the supplementary information Hn for each area in the image data Sn for the corresponding area using a deep layer encryption to obtain image data S1 containing the embedded supplementary information H. See, Col. 12, ln 17 to col. 13, ln 12. In other words, Usami et al. discloses that the supplementary information Hn is encrypted and the encrypted supplementary information is added to the image data Sn.

Applicant submits that Usami et al. does not disclose or suggest that the information S1 is encrypted after the supplementary information H has been embedded. Therefore, Usami et al. does not disclose or suggest that the *information-added* data is encrypted. Moreover, that patent does not disclose or suggest that information-added data is encrypted to make it difficult to detect a position where the additional information is added, and specifically that patent does not disclose or suggest that information-added data is encrypted by randomly arranging the data. To the contrary, the supplementary information Hn is embedded in the corresponding image data Sn and therefore the position of adding the data is fixed.

Hamada et al. fails to remedy the above-mentioned deficiencies of Usami et al. Hamada et al. discloses a technique for encrypting supplementary information such as an

identification number, and for recording the encrypted supplementary information onto a recording medium together with an image of a face. Like Usami et al., Hamada et al. does not disclose or suggest encrypting information-added data, encrypting the information-added data to make it difficult to determine a position where additional information is added to image data, or encrypting the information-added data by randomly arranging the data.

For the foregoing reasons, Applicant submits that the present invention recited in independent Claim 1 is patentable over the art of record. Independent Claims 17, 19, and 22 recite similar features and are believed patentable for reasons similar to Claim 1. The dependent claims are patentable for at least the same reasons as the independent claims, as well as for the additional features they recite.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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